

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA**

**CONSUMER FINANCIAL  
PROTECTION BUREAU,**

**Plaintiff ,**

**vs.**

**UNIVERSAL DEBT &  
PAYMENT SOLUTIONS,  
LLC; et. al.,**

**Defendants**

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**No. 1:15-CV-0859-RWS**

**CONNECT, LLC'S ANSWER TO PLAINTIFF'S COMPLAINT WITH  
AFFIRMATIVE DEFENSES AND CROSSCLAIM**

**AND NOW** comes Defendant Global Connect, LLC ("GC"), by and through its undersigned counsel who respectfully submits this Answer to Plaintiff's Complaint with Affirmative Defenses and Crossclaim, and in support thereof avers as follows:

**INTRODUCTION**

1. Admitted in part, denied in part. GC admits that the Consumer Financial Protection Bureau (the "Bureau") brings this action under the Consumer Financial Protection Act ("CFPA"), 12 U.S.C. §§ 5531, 5536(a), and the Fair Debt Collection Practices Act ("FDCPA"), 15 U.S.C. §§ 1692-1692p. GC admits that the Bureau seeks preliminary and permanent injunctive relief, restitution,

disgorgement, civil money penalties, and other unidentified relief. GC denies violating the CFPA and/or the FDCPA, and thus denies that the Bureau is entitled to the relief it seeks as against GC. GC denies engaging in “unlawful collection of purported debt.” GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff’s Complaint. Strict proof of GC’s alleged violations of the CFPA and FDCPA, as well as of the Bureau’s entitlement to injunctive and/or monetary damages from GC, is hereby demanded.

2. Admitted in part, denied in part. GC admits that certain parties identified as “Debt Collectors” in the Bureau’s Complaint utilized telephone broadcasting services. As to the remaining allegations, after reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of the Bureau’s allegations, and as such these allegations are denied. Such allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff’s Complaint.

3. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of the Bureau’s allegations, and as such these allegations are denied. Such allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded.

4. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of the Bureau's allegations, and as such these allegations are denied. Such allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

5. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of the Bureau's allegations, and as such these allegations are denied. Such allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

6. Denied. GC specifically denies "facilitating" the Debt Collectors' alleged conduct. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

7. Denied. GC specifically denies that it broadcast messages for the Debt Collectors; to the contrary, GC provides its users, including the Debt

Collectors, with a servicing platform by which its users can broadcast messages of their own choosing. GC neither originated nor controlled its users' messages (including the Debt Collector's messages), and thus GC denies that it knew, or should have known, that the Debt Collectors' messages were allegedly unfair or deceptive. GC specifically denies that it "materially contributed" to the Debt Collectors' purported scheme. These allegations are also denied as conclusions of law to which no response is required. Strict proof of all allegations is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

### **JURISDICTION AND VENUE**

8. Denied. These allegations are denied as conclusions of law to which no response is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

9. Denied. These allegations are denied as conclusions of law to which no response is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

### **PARTIES**

10. Denied. These allegations are denied as conclusions of law to which no response is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

### **Debt Collectors**

11. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

12. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

13. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any

other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

14. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

15. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

16. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

17. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and

as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

18. Admitted in part and denied in part. GC admits that the Bureau refers to these entities collectively as "UDPS" in its Complaint. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

19. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

20. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any

other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

21. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

22. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

23. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any



other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

24. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

25. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

26. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any

other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

27. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

28. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

29. Admitted. GC admits that the Bureau collectively refers to WNY Account Solutions, LLC, and to WNY Solutions Group, LLC as "WNY" in this complaint. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

30. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and

as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

31. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

32. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

33. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to

which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

34. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

35. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

36. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any

other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

37. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

38. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

39. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any

other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

40. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

41. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

42. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any

other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

43. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

44. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

45. Admitted. GC admits that the Bureau collectively refers to UDPS, UDS, WNY, Check & Credit Recovery, Credit Power and SPPS as "Debt Collector LLCs" in its complaint. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

46. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

47. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

48. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

49. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and



as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

50. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

51. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

52. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any

other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

53. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

54. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

55. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

56. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

57. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

58. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

59. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and

as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

60. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

61. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

62. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other

allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

63. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

64. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

65. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any

other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

66. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

67. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

68. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

69. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

70. Admitted. GC admits that, in its complaint, the Bureau collectively refers to the individual defendants and Debt Collector LLCs as Debt Collectors. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

71. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

72. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other

allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

73. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

74. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

75. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any



other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

### **Payment Processors**

76. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

77. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

78. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any

other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

79. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

80. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

81. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any

other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

82. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

83. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

84. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any

other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

85. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

86. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

87. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

88. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded.

89. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

90. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

### **Telephone Broadcast Service Provider**

91. Denied. GC denies it is a New Jersey limited liability company registered at this address. By way of further response, GC is a limited liability company incorporated under the laws of the state of Nevada. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

92. Denied. GC denies providing "material services" to persons who collect debt or to the Debt Collectors in connection with their collection of debt. To the contrary, GC is a common carrier which provides all of its users with a servicing platform by which its users can broadcast messages of their own choosing. GC specifically denies that it meets the definition of "service provider" under the CFPA. These allegations are also denied as conclusions of law to which no response is required. Strict proof of all allegations is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

93. Denied. These allegations are denied as conclusions of law to which no response is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

## **FACTUAL ALLEGATIONS**

### **The Debt Collection Scheme**

94. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

95. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

96. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded.

97. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other

allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

98. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

99. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

100. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.



***Obtaining Consumers' Information***

101. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

102. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

103. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

104. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other

allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

105. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

106. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

### ***Contacting Consumers***

107. Admitted in part and denied in part. GC admits it provided telephone broadcast services to certain of the companies identified by the Bureau as Debt Collector LLCs. GC admits that other GC users may collect debt. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of the remaining averments in this paragraph, and as such they

are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

108. Admitted in part, denied in part. GC admits that some users of its software platform would upload a list of names and phone numbers and a recorded message as part of the process by which they would utilize GC's services. GC denies that the only steps a GC user must take to utilize GC's services is provide GC with a list of phone numbers and a recorded message. GC denies that all individuals and entities identified by the Bureau as "Debt Collectors" utilized GC's services, and thus denies that all such individuals and entities utilized GC's service in the manner described in this paragraph. Unless specifically admitted, all remaining allegations in this paragraph are specifically denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

109. Denied as stated. GC denies that it broadcasts messages "on behalf of" its users, and specifically denies that it broadcast any messages "on behalf of" the Debt Collectors. Rather, GC provides a software platform enabling its users to transmit their own messages. By way of further response, any messages broadcast by GC users, whether Debt Collectors or otherwise, speak for themselves. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

110. Denied. Any messages, pre-recorded or otherwise, broadcast by the Debt Collectors speak for themselves. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

111. Denied. GC denies that consumers received calls "from Global Connect." To the contrary, GC's users, including those Debt Collectors which utilized GC's services, initiate the calls and send the messages at issue. GC is merely the carrier that transmits the call or message. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to what number would appear on a consumer's caller identification when receiving a call from a Debt Collector, and as such these allegations are denied. By way of further response, it is the **user**, and not GC, that determines what number will appear on a consumer's caller identification. Strict proof of all allegations is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

112. Denied. GC denies making phone calls to consumers. To the contrary, GC's users, including those Debt Collectors which utilized GC's services, initiate the calls and send the messages at issue. GC denies that it left pre-recorded voice messages with consumers' voice mail or answering machines. To the contrary, GC's users, including those Debt Collectors which utilized GC's services, left the messages at issue. Strict proof is hereby demanded. GC denies

any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

113. Denied. GC denies making phone calls to and leaving messages for consumers, and thus denies that over one million consumers either answered GC's call or received a pre-recorded message. GC's users, including those Debt Collectors which utilized GC's services, make calls and leave messages. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

114. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations as they pertain specifically to the Debt Collectors, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

115. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

116. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

117. Admitted in part, denied in part. GC admits that in May 2014, it produced certain information to the Bureau in response to the Bureau's Civil Investigative Demand ("CID"). GC denies that it provided the Bureau with "copies of the messages it was broadcasting on behalf of the Debt Collectors" as GC does not broadcast messages "on behalf of" its users. By way of further response, GC denies the Bureau's characterization that all such messages were being broadcast at the time GC responded to the Bureau's CID. In response to the Bureau's CID, GC produced all messages in its possession that were created and utilized by the individuals and companies identified in the Bureau's CID, regardless of whether these messages were currently being used by those individuals and companies identified in the Bureau's CID. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

118. Admitted in part, denied in part. GC admits that it provided the Bureau with the requested users' call logs in response to the Bureau's CID. GC

denies the Bureau's characterization of what the call logs "showed." The call logs are documents which speak for themselves. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

119. Denied. GC specifically denies that it knew it was broadcasting unfair or deceptive messages, either before or after it responded to the Bureau's CID. GC specifically denies any implication that a third-party request for information about GC's users should serve as notice to GC that its user may be utilizing GC's services inappropriately. GC specifically denies that it, as a common carrier, bears the burden of investigating its thousands of users and determining whether any users may be using GC's services for an improper purpose. GC specifically denies having any knowledge, either before or after it responded to the Bureau's CID, about the Debt Collectors' alleged scheme. GC specifically denies materially contributing to any such purported scheme. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

***The individual defendants were personally engaged in the unlawful scheme.***

120. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

121. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

122. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

123. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and



as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

124. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

125. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

126. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

127. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

128. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

129. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

130. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other

allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

131. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

132. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

133. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

134. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and

as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

135. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

136. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

137. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

138. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

139. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

140. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

141. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other

allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

142. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

143. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

#### **The Payment Processors Facilitated the Debt Collection Scheme**

144. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

145. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

146. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

147. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

148. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other

allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

149. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

150. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

150. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

151. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and



as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

***The Payment Processors and ISOs failed to follow policies and procedures to prevent consumer harm***

152. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

153. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

154. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other

allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

155. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

156. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

157. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

158. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and

as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

159. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

160. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

161. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

162. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

163. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

164. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

***Pathfinder's underwriting and risk monitoring were deficient***

165. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other

allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

166. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded.

167. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

168. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

169. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other

allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

170. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

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179. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

180. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other



allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

181. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

182. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

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192. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

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195. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and

as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

***Frontline's underwriting and risk monitoring were deficient***

196. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

197. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

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209. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.



210. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

211. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded.

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allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

218. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

***Global Payments, Pathfinder, and Frontline failed to appropriately monitor the UDPS and Credit Power accounts***

219. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

220. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

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as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

229. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

230. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

231. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

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as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

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***EMS's underwriting and risk monitoring were deficient***

247. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

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285. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

***To continue their collection scheme, Brown, Varinderjit Bagga, and Khan opened additional processing accounts with another payment processor***

286. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

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291. Denied. After reasonable investigation, GC lacks sufficient knowledge and information to form a belief as to the truth of these allegations, and as such they are denied. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

**DEBT COLLECTORS' VIOLATIONS OF THE FDCPA**

292. The averments in this paragraph are directed to parties other than GC, and as such no response from GC is required.

293. The averments in this paragraph are directed to parties other than GC, and as such no response from GC is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

294. The averments in this paragraph are directed to parties other than GC, and as such no response from GC is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

**Count I: Harassment and Abuse in Connection with Collection of a Debt**

295. Paragraphs 1 through 294 of this Answer are hereby incorporated by reference as though more fully set forth herein.

296. The averments in this paragraph are directed to parties other than GC, and as such no response from GC is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

297. The averments in this paragraph are directed to parties other than GC, and as such no response from GC is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.



**Count II: Using False, Deceptive and Misleading Representations  
to Collect a Debt**

298. Paragraphs 1 through 297 of this Answer are hereby incorporated by reference as though more fully set forth herein.

299. The averments in this paragraph, including all subparts, are directed to parties other than GC, and as such no response from GC is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

300. The averments in this paragraph are directed to parties other than GC, and as such no response from GC is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

**Count III: Failing to Validate Debts**

301. Paragraphs 1 through 300 of this Answer are hereby incorporated by reference as though more fully set forth herein.

302. The averments in this paragraph, including all subparts, are directed to parties other than GC, and as such no response from GC is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

303. The averments in this paragraph are directed to parties other than GC, and as such no response from GC is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

### **THE CONSUMER FINANCIAL PROTECTION ACT**

304. Denied. These allegations are denied as conclusions of law to which no response is required.

305. Denied. These allegations are denied as conclusions of law to which no response is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

306. Denied. These allegations are denied as conclusions of law to which no response is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

307. Denied. These allegations are denied as conclusions of law to which no response is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

### **DEBT COLLECTORS' VIOLATIONS OF THE CFPA**

#### **Count IV: Violations of the FDCPA**

308. Paragraphs 1 through 307 of this Answer are hereby incorporated by reference as though more fully set forth herein.

309. The averments in this paragraph are directed to parties other than GC, and as such no response from GC is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

310. The averments in this paragraph are directed to parties other than GC, and as such no response from GC is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

311. The averments in this paragraph are directed to parties other than GC, and as such no response from GC is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

### **Count V: Deceptive Acts or Practices**

312. Paragraphs 1 through 311 of this Answer are hereby incorporated by reference as though more fully set forth herein.

313. The averments in this paragraph, including all subparts, are directed to parties other than GC, and as such no response from GC is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

314. The averments in this paragraph, including all subparts, are directed to parties other than GC, and as such no response from GC is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

315. The averments in this paragraph are directed to parties other than GC, and as such no response from GC is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

316. The averments in this paragraph are directed to parties other than GC, and as such no response from GC is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

317. The averments in this paragraph are directed to parties other than GC, and as such no response from GC is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

**Count VI: Unfair Acts or Practices**

318. Paragraphs 1 through 317 of this Answer are hereby incorporated by reference as though more fully set forth herein.

319. The averments in this paragraph are directed to parties other than GC, and as such no response from GC is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

320. The averments in this paragraph are directed to parties other than GC, and as such no response from GC is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

321. The averments in this paragraph are directed to parties other than GC, and as such no response from GC is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

**Count VII: Providing Substantial Assistance to the Debt Collector LLCs'  
Unfair or Deceptive Conduct**

322. Paragraphs 1 through 321 of this Answer are hereby incorporated by reference as though more fully set forth herein.

323. The averments in this paragraph are directed to parties other than GC, and as such no response from GC is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

324. The averments in this paragraph are directed to parties other than GC, and as such no response from GC is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

325. The averments in this paragraph are directed to parties other than GC, and as such no response from GC is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

## **PAYMENT PROCESSORS' VIOLATIONS OF THE CFPA**

### **Count VIII: Providing Substantial Assistance to the Debt Collectors' Unfair or Deceptive Conduct**

326. Paragraphs 1 through 325 of this Answer are hereby incorporated by reference as though more fully set forth herein. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

327. The averments in this paragraph are directed to parties other than GC, and as such no response from GC is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

328. The averments in this paragraph are directed to parties other than GC, and as such no response from GC is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

329. The averments in this paragraph are directed to parties other than GC, and as such no response from GC is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

330. The averments in this paragraph are directed to parties other than GC, and as such no response from GC is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

### **Count IX: Unfair Acts or Practices**

331. Paragraphs 1 through 330 of this Answer are hereby incorporated by reference as though more fully set forth herein. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

332. The averments in this paragraph are directed to parties other than GC, and as such no response from GC is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

333. The averments in this paragraph are directed to parties other than GC, and as such no response from GC is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

334. The averments in this paragraph are directed to parties other than GC, and as such no response from GC is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

335. The averments in this paragraph are directed to parties other than GC, and as such no response from GC is required. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

## **GLOBAL CONNECT'S VIOLATIONS OF THE CFPA**

### **Count X: Providing Substantial Assistance to the Debt Collectors' Unfair or Deceptive Conduct**



336. Paragraphs 1 through 335 of this Answer are hereby incorporated by reference as though more fully set forth herein. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

337. Denied. GC specifically denies violating any aspect of the CFPA. GC denies providing "substantial assistance" to any alleged unlawful conduct. GC denies broadcasting threatening messages; to the contrary, as a common carrier, GC only transmitted its users' messages. GC specifically denies "enabling" the Debt Collectors. GC specifically denies the Bureau's characterization of its services as an "automated system." These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

338. Denied. GC specifically denies providing "substantial assistance" to any unlawful conduct, whether knowingly or recklessly. GC, as a common carrier, merely transmits its users' messages and does not determine the contents of such messages. GC specifically denies that it knew, or should have known, that one of its users' messages could potentially be construed as unfair or deceptive. GC specifically denies that it knew, or should have known, that the Debt Collectors were engaged in alleged unlawful debt collection activities. These allegations are also denied as conclusions of law to which no response is required. Strict proof is

hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

339. Denied. GC specifically denies these allegations, and incorporates its responses to Paragraphs 337 and 338 as though more fully set forth herein. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

#### **Count XI: Unfair Acts or Practices**

340. Paragraphs 1 through 339 are hereby incorporated by reference as though more fully set forth herein.

341. Denied. GC specifically denies violating any aspect of the CFPA. GC denies providing "material services" to the Debt Collectors. GC denies broadcasting threatening messages; to the contrary, as a common carrier, GC merely transmitted its users' messages. For the same reason, GC specifically denies broadcasting messages "on behalf of" the Debt Collectors. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

342. Denied. GC specifically denies that any of its acts or practices caused, or were likely to cause, substantial injury to consumers. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

343. Denied. GC specifically denies these allegations, and incorporates its responses to Paragraphs 341 and 342 as though more fully set forth herein. These allegations are also denied as conclusions of law to which no response is required. Strict proof is hereby demanded. GC denies any other allegation not expressly admitted contained in this paragraph of Plaintiff's Complaint.

### **THIS COURT'S POWER TO GRANT RELIEF**

344. Admitted in part, denied in part. GC admits that Paragraph 344 of the Bureau's Complaint contains an accurate recitation of the Court's powers to grant legal and/or equitable relief under the CFPA. GC specifically denies that it engaged in any act or omission warranting the imposition of any such legal and/or equitable relief as against GC. Strict proof is hereby demanded.

WHEREFORE, Defendant Global Connect, LLC respectfully requests that this Honorable Court enter judgment in its favor and against the Bureau; dismiss

the Bureau's claims against it, with prejudice; and further award all such other relief as is just and appropriate.

### **FIRST AFFIRMATIVE DEFENSE**

The Bureau's Complaint fails to state claims against GC under the CFPA for which this Court may grant relief.

### **SECOND AFFIRMATIVE DEFENSE**

GC is a common carrier and as such, it is exempt from liability for its users' transmissions.

### **THIRD AFFIRMATIVE DEFENSE**

GC neither had a high degree of involvement in nor actual notice of the purportedly illegal use of its services and as such, it is exempt from liability for its users' transmissions.

### **FOURTH AFFIRMATIVE DEFENSE**

Under the CFPA, the term "service provider" does not include persons or businesses offering "a support service of a type provided to businesses generally or a similar ministerial service." 12 U.S.C. § 5481(26)(B)(i). Because GC merely provides a software platform by which businesses of all types can make use of

telephone and text broadcast services, GC does not fall within the definition of a “service provider” subject to liability under the CFPA.

#### **FIFTH AFFIRMATIVE DEFENSE**

Any violation of the law was due to the affirmative acts and/or omissions of others. Such acts and/or omissions do not give rise to liability by GC.

#### **SIXTH AFFIRMATIVE DEFENSE**

Any damages sustained by consumers were due to the affirmative acts and/or omissions of others. Such acts and/or omissions do not give rise to liability by GC.

#### **SEVENTH AFFIRMATIVE DEFENSE**

Any violation of the law was due to the affirmative acts and/or omissions of others. Such acts and/or omissions do not give rise to a claim for damages against GC.

#### **EIGHTH AFFIRMATIVE DEFENSE**

Any damages sustained by consumers were due to the affirmative acts and/or omissions of others. Such acts and/or omissions do not give rise to a claim for damages against GC.

#### **NINTH AFFIRMATIVE DEFENSE**

At all times material to the Bureau's claims, GC acted in good faith and without malice or intent to injure consumers or others.

#### **TENTH AFFIRMATIVE DEFENSE**

At no time material to the Bureau's claims did GC exercise a high degree of involvement in the Debt Collectors' telephone messages, as GC neither controlled the Debt Collectors' recipient lists nor controlled the content of the Debt Collectors' transmissions.

#### **ELEVENTH AFFIRMATIVE DEFENSE**

At no time material to the Bureau's claims did GC have actual knowledge of the Debt Collectors' alleged unlawful activity, as GC has thousands of users who broadcast thousands of messages on a daily basis and thus GC cannot reasonably have been expected to know that an infinitesimally small percentage of the thousands of calls placed may have been considered unfair or deceptive.

#### **TWELFTH AFFIRMATIVE DEFENSE**

The fact that the CFPB issued a CID to GC for certain information regarding certain of GC's users is not sufficient to constitute "actual knowledge" to GC of any potential unlawful activity by its users.

#### **THIRTEENTH AFFIRMATIVE DEFENSE**

The fact that GC prohibited its users from engaging in unlawful use of GC's services does not negate GC's common carrier status.

#### **FOURTEENTH AFFIRMATIVE DEFENSE**

The fact that GC prohibited its users from engaging in unlawful use of GC's services does not imbue GC with "actual knowledge" that the Debt Collectors were purportedly engaging in unlawful use of GC's services.

#### **FIFTEENTH AFFIRMATIVE DEFENSE**

GC neither edits nor modifies the content of its users' messages.

#### **DEFENDANT GLOBAL CONNECT, LLC'S CROSSCLAIMS AGAINST MOHAN BAGGA, MARCUS BROWN, CHECK AND CREDIT RECOVERY, AND WNY ACCOUNT SOLUTIONS GROUP**

1. GC, by way of crossclaims for indemnification against defendants Mohan Bagga, Marcus Brown, Check and Credit Recovery, and WNY Account Solutions Group ("Crossclaim Defendants"), alleges that if it should be found liable (which is specifically denied), it crossclaims against the Crossclaim Defendants with respect to any loss, liability or expense on account of the Bureau's demand for relief.

2. GC, by way of crossclaims for contribution against Crossclaim Defendants, alleges that if it should be found liable (which is specifically denied),

it crossclaims against the Crossclaim Defendants with respect to any loss, liability or expense on account of the Bureau's demand for relief.

3. GC is entitled to contribution and/or indemnification against all Crossclaim Defendants.

WHEREFORE, Global Connect, LLC demands judgment for contribution and/or indemnification against all Crossclaim Defendants.

Respectfully submitted,

**BOVIS, KYLE, BURCH & MEDLIN**

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Dated: May 7, 2015

**CERTIFICATE OF COMPLIANCE**

In accordance with Local Rule 7.1(D), I hereby certify that the foregoing document was prepared in compliance with Local Rule 5.1(B) in 14-point Times New Roman font.

**BOVIS, KYLE, BURCH & MEDLIN**

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 7, 2015, copies of the foregoing document were served on all attorneys of record via CM/ECF.

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